

**City of
Lake
Forest**

**2018 -
2019**

**CDBG
Annual
Action Plan**

DRAFT – March 13, 2018

TABLE OF CONTENTS

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)	1
PR-05 Lead & Responsible Agencies – 91.200(b).....	5
AP-10 Consultation – 91.100, 91.200(b), 91.215(l).....	6
AP-12 Participation – 91.105, 91.200(c)	14

Expected Resources

AP-15 Expected Resources – 91.220(c) (1, 2)	16
---	----

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)	19
AP-35 Projects – 91.220(d)	22
AP-38 Projects Summary.....	23
AP-50 Geographic Distribution – 91.220(f).....	31

Affordable Housing

AP-55 Affordable Housing – 91.220(g)	32
AP-60 Public Housing – 91.220(h).....	33
AP-65 Homeless and Other Special Needs Activities – 91.220(i).....	34
AP-75 Barriers to affordable housing – 91.220(j)	37
AP-85 Other Actions – 91.220(k)	38

Program Specific Requirements.....	40
------------------------------------	----

Attachments:

1. Five-year Consolidated Plan and One-year Goals/Accomplishments
2. Public Notice – 30-day Public Comment Period and Public Hearing
3. Map – Low and Moderate-income Concentration
4. Analysis of Impediments to Fair Housing – Summary & Action Plan
5. Certifications and SF-424

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The 2018-19 Annual Action Plan for the City of Lake Forest satisfies the requirements to receive Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD). The CDBG program was created by the Housing and Community Development Act (HCDA) of 1974. The primary objective of the CDBG program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income.

Regulations governing the CDBG program require that each activity undertaken with CDBG funds must meet one of the three national objectives:

- Benefit low- and moderate-income persons,
- Aid in the prevention or elimination of slums and blight, or
- Meet a community development need having a particular urgency (i.e., federally declared disaster)

As a recipient of CDBG funds, the City is required to prepare a five-year strategic plan that identifies housing and community needs, prioritizes these needs, and develops a strategic plan to address priority needs. This document is called the Consolidated Plan. The City's current Consolidated Plan covers the fiscal years of 2015-16 to 2019-20. On an annual basis, the City prepares an expenditure plan that identifies the specific activities the City will undertake with its annual CDBG allocation to meet the priority needs identified in the Consolidated Plan. Fiscal Year (FY) 2018-19 is the fourth year of the current Consolidated Plan cycle.

To date, HUD has not announced funding levels for FY 2018-19. For planning purposes, City staff is estimating the City will receive \$375,000 for FY 2018-19. Additionally, \$33,974 in prior year funds and \$90,000 in estimated program income will be available for programing. It is important to note that due to the delay in the approval of the 2018 federal budget, the City followed HUD guidance in developing its draft Action Plan (HUD CPD Notice 18-1). The draft Action Plan indicates that once HUD announces CDBG allocations, activities recommended for FY 2018-19 CDBG funding will be proportionally increased or decreased from the estimated funding levels to match the actual allocation amount.

2. Summarize the objectives and outcomes identified in the Plan

The City of Lake Forest City Council approved the 2015-2019 Consolidated Plan in May 2015. The following Consolidated Plan objectives and outcomes were adopted in the plan. Corresponding annual accomplishment goals for FY 2018-19 are also listed below:

- Rehabilitate the City's existing single-family housing stock, including mobile homes: 5-Year Goal: Rehabilitate 55 units with CDBG funds / FY 18-19 Goal: Rehabilitate 14 units
- Support the Orange County Housing Authority's implementation of federal rental assistance programs in Lake Forest: 5-Year Goal: Assist 875 households with rental assistance vouchers/certificates / FY 18-19 Goal: Support assistance for 200 households with rental assistance vouchers/certificates
- Provide supportive services and housing for those at risk of becoming homeless: 5-Year Goal: Assist 25 individuals with CDBG funds / FY 18-19 Goal: 17 individuals
- Provide fair housing services that address impediments that may limit a person's ability to choose a residence free from discrimination: 5-Year Goal: Assist 400 individuals with CDBG funds / FY 18-19 Goal: Assist 175 individuals (70 households)
- Provide services to eligible low- and moderate-income youths: 5-Year Goal: Assist 150 individuals with CDBG funds / FY 18-19 Goal: Assist 12 individuals
- Provide services to eligible low- and moderate-income seniors: 5-Year Goal: Assist 200 individuals with CDBG funds / FY 18-19 Goal: Assist 41 individuals
- Provide services to eligible low- and moderate-income persons: 5-Year Goal: Assist 15,000 individuals with CDBG funds / FY 18-19 Goal: Assist 2,922 individuals
- Provide services to eligible low- and moderate-income persons with disabilities: 5-Year Goal: Assist 100 individuals with CDBG funds / FY 18-19 Goal: Assist 38 individuals
- Undertake infrastructure and/or facility improvements benefitting low- and moderate-income persons and those with special needs: 5-Year Goal: Undertake 5 projects with CDBG funds / FY 18-19 Goal: Undertake 1 project
- Administer federal grant funds: 5-Year Goal: Administer 5 years of CDBG funds / FY 18-19 Goal: Administer 1 year

While not funded with CDBG, Lake Forest will continue to implement its City-funded economic development program with the goal of expanding economic opportunities for all residents. Activities planned for FY 2018-19 include the following:

- **Free Business Seminars:** Topic-specific seminars and workshops provide Lake Forest entrepreneurs and businesses with resources to grow and expand their business operations. The City often partners with SCORE Business Counselors, Lake Forest Chamber of Commerce,

Orange County-One Stop Center, Orange County Small Business Development Center, U.S. Small Business Administration, IRS, and Employment Development Department on a variety of topics.

- **Shop & Dine Lake Forest Week:** A free citywide marketing program that promotes a sustainable local economy by providing all Lake Forest businesses with free advertising of their products and services. Participating businesses are promoted in a citywide coupon booklet mailed to approximately 32,000 addresses and advertised through print and radio advertisements. The annual event has resulted in increased sales for Lake Forest businesses and assisted in attracting new customers to Lake Forest shopping centers.
- **GROW in Lake Forest:** GROW (Growing and Retaining Our Workforce) in Lake Forest is a job creation and retention program aimed at attracting employers to the City by assisting them with current and future hiring and employee retention needs. This includes connecting employers with free candidate screening, on-site job recruitment fairs, and specialized employee training credits offered through the Workforce Investment Board and Orange County One-Stop Centers.
- **Career Workshop:** The City will host an event for Lake Forest job seekers that provides direct and practical advice for resume preparation and job interviews.
- **Expedited Business Assistance Program:** Staff often coordinates inter-departmental meetings with companies and/or their representing commercial broker at the onset of their location or expansion project. Staff from Economic Development, Planning, Building, and Public Works divisions will meet with the representatives to discuss the plan check and building permit review process as well as other related development issues.

3. Evaluation of past performance

Fiscal Year 2016-2017 was the second year of the City's 2015-19 Consolidated Plan cycle; most activities were completed by June 30, 2017. Fiscal Year 2017-18 is the third year, and is not yet complete. A table that summarizes the City's five-year Consolidated Plan goals and one-year accomplishments (for FY 2016-17) is provided as **Attachment 1**.

4. Summary of Citizen Participation Process and consultation process

Residents, local and regional organizations were encouraged to participate in the preparation of the City's 2018-19 Annual Action Plan. There were several opportunities for residents and agencies/organizations to provide input:

- The City invited social service providers to a meeting on November 10, 2017, at which staff provided information regarding Consolidated Plan priorities, the public service grant application process, and current community needs. Ten current and potential subrecipients attended the meeting.
- A public meeting with City Council was held on March 20, 2018, to inform the City Council about the Annual Action Plan process, solicit public comments, and to kick-off the 30-day review period for the 2018-19 Annual Action Plan.

- A draft of the 2018-19 Action Plan was available for a 30-day public comment period from March 30 to April 30, 2018.
- The Annual Action Plan is scheduled to be adopted by the City Council after hearing any public comments at a public hearing on May 1, 2018.

5. Summary of public comments

To be updated at the end of the public comment period and public hearing.

6. Summary of comments or views not accepted and the reasons for not accepting them

To be updated at the end of the public comment period and public hearing.

7. Summary

The Consolidated Plan is a strategic plan that utilized data and public input to determine priority housing and community needs. The Annual Action Plan is the expenditure plan for the use of CDBG funds to address identified priority needs. The City's overall objective for the CDBG program is to create a viable community by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income. To accomplish this objective, the City of Lake Forest will utilize an estimated [\\$498,974 in CDBG funds \(\\$375,000 in 2018 funds plus \\$33,974 in prior year funds and \\$90,000 in anticipated program income\)](#) during FY 2018-19 to carry out a variety of eligible activities.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	LAKE FOREST	Development Services

Table 1 – Responsible Agencies

Narrative (optional)

The Development Services Department is responsible for overseeing the administration of the City's CDBG funding, including the preparation of the Consolidated Plan, Annual Action Plans, and year-end performance reports (Consolidated Annual Performance and Evaluation Report or CAPER).

Consolidated Plan Public Contact Information

Ron Santos, Senior Planner
25550 Commercentre Drive, Suite 100, Lake Forest, CA 92630
(949) 461-3449 (phone) / rsantos@lakeforestca.gov

AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

The consolidated planning process (i.e., Annual Action Plan process) requires that the City contact and consult with other public and private agencies when developing the plan. The plan itself must include a summary of the consultation process, including identification of the agencies that participated in the process. Below is a summary of the City's efforts to coordination interaction with other public and private agencies.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))

In preparing the Action Plan, the City consulted with various organizations located in Lake Forest and Orange County that provide housing and services to the residents of Lake Forest. In many instances, these consultations are part of ongoing interactions between the City of Lake Forest and the agency or group described below:

- County of Orange – Ongoing interaction with various County agencies to ensure the health and safety of the community (e.g., OC Sheriff, OC Health Care Agency).
- Orange County Housing Authority – Support for the local public housing authority's efforts to administer the Housing Choice Voucher program throughout Lake Forest.
- 211-OC – Continued support for the regional homeless Continuum of Care (CoC) coordinating agency by providing data regarding resources made available by the City to support CoC activities, and by providing input regarding the priority needs of the region's homeless and persons at risk of homelessness.
- Nonprofit Service Agencies – Interaction and support for a variety of social services made available to Lake Forest residents.
- Business Community - Lake Forest has a very active economic development program that coordinates business activities and employment programs with community organizations such as the Lake Forest Chamber of Commerce and the Orange County One-Stop Center. *(NOTE: These activities are not supported with CDBG funds.)*

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City supports the actions of the Orange County Continuum of Care (CoC) to address the needs of homeless persons in the county. The CoC consists of six basic components: advocacy on behalf of

homeless persons and those at risk of becoming homeless, outreach, prevention, emergency shelters, transitional housing, and permanent housing/rapid re-housing.

The City collaborates and relies on its nonprofit partners to reach out to and address the needs of homeless persons in the City. Direct financial assistance is provided to nonprofit agencies that offer food and shelter assistance. Homeless and near homeless persons are also served with utilities/rent assistance, case management, referrals, and job development skills. For FY 2018-19, the City made an effort to reach out to local agencies that address homeless issues.

The Orange County 2017 Point-In-Time Count and Survey (PITS) provided information regarding the composition of the countywide homeless population. The 2017 PITS identified 4,792 homeless individuals in Orange County (3,826 households). Approximately 19% of the County's homeless population are chronically homeless (893 individuals). The 2017 PITS also identified 398 homeless households. Most homeless families are sheltered - approximately 5% were unsheltered with 1% of homeless households considered to be chronically homeless. With respect to homeless veterans, approximately 10% of the County's homeless population was identified as veterans (405 individuals). Eighty-eight percent (88%) of veterans were unsheltered, and 31% of homeless veterans were identified as chronically homeless. A total of 153 unaccompanied youth (ages 18 to 24) were identified in the regional 2017 PITS – 49% were unsheltered.

As part of the 2017 PITS, an analysis of Lake Forest's homeless unsheltered population was also conducted. The local survey found 38 unsheltered homeless adults living in the City – approximately 1.5% of the unsheltered homeless population identified in the countywide 2017 PITS. Thirty-six (36) were age 24 plus – two were age 18 to 24. The majority of these individuals were male (32 males and 6 females); approximately three-fourths were racially White (73.7%) and 32% were ethnically Hispanic.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City of Lake Forest does not receive Emergency Solutions Grant (ESG) funding directly from HUD.^[1] The leadership and coordination of Orange County's CoC planning process is the shared responsibility of 211-OC and the County of Orange. The Homeless Management Information System (HMIS) is used by the CoC to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. All aspects of HMIS administration are the responsibility of the CoC.

[1. The cities of Anaheim, Garden Grove and Santa Ana receive ESG funds directly from HUD and administer these funds within their respective jurisdictions.]

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities (see Table 2):

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Orange County Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided data regarding households receiving HUD rental assistance and regarding households on wait list for housing assistance.
2	Agency/Group/Organization	211 Orange County
	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Homeless Management Information System (HMIS)
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided data regarding regional homeless, housing/service gaps for homeless, and HMIS management.
3	Agency/Group/Organization	Fair Housing Council of Orange County
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Impediments to Fair Housing

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided data regarding fair housing issues in the community and input on impediments to fair housing. Also assisted in developing action steps to address impediments to fair housing.
4	Agency/Group/Organization	Age Well Senior Services
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the housing and service needs of seniors, including home bound seniors.
5	Agency/Group/Organization	Families Forward
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Strategy Anti-poverty Strategy Needs of Low/Mod persons
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding housing and service needs of homeless families and families at risk of becoming homeless.
6	Agency/Group/Organization	Family Assistance Ministry
	Agency/Group/Organization Type	Services - Housing Services-homeless

	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Veterans Anti-poverty Strategy Needs of Low/Mod persons
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding housing and service needs of homeless households and households at risk of becoming homeless.
7	Agency/Group/Organization	South County Outreach
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Needs of Low/Mod persons
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the needs of lower income households specifically, individuals/households at risk of becoming homeless.
8	Agency/Group/Organization	Vocational Visions
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding needs of adults with developmental disabilities, specifically developing economic opportunities for this special need population.

9	Agency/Group/Organization	Saddleback Valley Unified School District
	Agency/Group/Organization Type	Services-Children Services-Education Public School District
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Needs of Low/Mod persons
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the need for childcare services for lower income households.
10	Agency/Group/Organization	Camino Health Center
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Needs of Low/Mod persons
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding medical/dental service needs of the community including homeless individuals.
11	Agency/Group/Organization	Alzheimer's Orange County
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the service needs of seniors with Alzheimer's and other forms of dementia.

12	Agency/Group/Organization	Mercy House
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Anti-poverty Strategy Needs of Low/Mod persons
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the needs of lower income households specifically, individuals/households at risk of becoming homeless and that are homeless.
13	Agency/Group/Organization	Laura's House
	Agency/Group/Organization Type	Services - Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the needs of victims of domestic violence.

Identify any Agency Types not consulted and provide rationale for not consulting

The City consulted with a variety of agencies serving Lake Forest residents and the region. No agency types were specifically left out of the consultation process.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	211-Orange County	Addressed issues pertaining to homelessness including the 2017 Homeless Point-in-Time Survey.
5-Year Plan & 1-Year Pubic Housing Authority (PHA) Plan	Orange County Housing Authority	Agency plans and policies related to providing rental assistance for very low-income households.
Housing Element	City of Lake Forest	Includes the goal of fostering affordable housing.
Capital Improvement Budget	City of Lake Forest	Includes multi-year plan for use CDBG funds for capital projects.
Neighborhood Park Improvement Phase II Study	City of Lake Forest	Multi-year plan that identifies citywide park improvements, some of which may be CDBG eligible.
Multi-Jurisdictional Analysis of Impediments to Fair Housing	16 OC Cities including Lake Forest	Identifies impediments to fair housing choice within the region and the city. Also provides strategy to address impediments.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The City of Lake Forest provided several opportunities for participation and comment throughout the Annual Action Plan preparation process. There was a public meeting before the City Council on March 20, 2018, which initiated a 30-day public review of the Annual Action Plan, with the final City Council adoption at a public meeting on May 1, 2018. The notice for the City Council public hearing is presented in **Attachment 2** of this plan.

The comments received through the citizen participation process were considered in the allocation of CDBG funds. The needs identified through the Consolidated Plan process are also incorporated into the Annual Action Plan as they are the basis of funding recommendations.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/broad community	Notification of availability of CDBG funding for FY 18-19	None	None	NA
2	Public Meeting	Public Service Agencies	A total of 10 agencies attended meeting to discuss social service needs and grant application process	Provided input regarding needs of homeless, homeless families and senior issues	None	NA
3	Public Meeting	Non-targeted/broad community	3/20/18 City Council meeting to initiate the public comment process	Representatives of 2 grant applicants asked the Council to support funding recommendations	None	NA

Draft
3/13/18

Annual Action Plan
2018-2019

14

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Internet Outreach	Non-targeted/broad community	Draft Action Plan posted on the City's web page	TBD	TBD	www.lakeforestca.gov/854/Community-Development-Block-Grant
5	Newspaper Ad	Non-targeted/broad community	30-day public comment period and public hearing notice	TBD	TBD	NA
6	Public Hearing	Non-targeted/broad community	5/1/18 public hearing to approve FY 18-19 Action Plan and authorize submission of the plan to HUD	TBD	TBD	NA

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c) (1, 2)

Introduction

At the time the 2015-2019 Consolidated Plan was prepared, the City anticipated it would receive an estimated \$382,000 annually in CDBG funding, for a five-year total of \$1,527,332. [Since the 2018 federal budget has not been approved, staff is estimating the City will receive \\$375,000 in CDBG funds for FY 2018-19.](#) The City will use CDBG funds for housing activities, public facility improvements, public services, and administrative costs. The table below provides a summary of anticipated resources that will be available during FY 2018-19. The table includes a carryover of prior year funds totaling \$33,974, plus an estimated amount of program income (i.e., \$90,000 in Revolving Loan funds which are repayments of previously funded housing rehabilitation loans).

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	375,000	90,000	33,974	498,974	382,000	CDBG annual allocation, prior year funds and projected loan repayments
Section 8	Public-federal	Housing	0	0	0	0	0	200 Lake Forest households receive

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
								rental assistance voucher or certificate

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

There is no match requirement for the CDBG program. Whenever possible, CDBG funds will be coupled with other local funds and/or private funding to generate a budget for a project or program. Prior to 2012, redevelopment tax-increment funds provided a significant source of local leverage; however, these resources are no longer available. Some housing assets formerly held by the City’s redevelopment agency are now administered by the City’s Housing Authority. It is possible that these assets may generate some revenue in future years, which could be used to leverage federal funds.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City of Lake Forest Housing Authority holds assets formerly held by the Lake Forest Redevelopment Agency. These assets include a 1.67-acre vacant parcel purchased from the Orange County Transportation Authority (“Authority Parcel”) and a tax-defaulted vacant parcel purchased from the County of Orange with Redevelopment funds (“Mamie Thomas Parcel”). It is important to note that while the Housing Authority received these assets from the Redevelopment Agency, the Housing Authority does not have an ongoing financing mechanism to maintain them.

In May 2017, City Council approved an agreement with the Jehovah Witness Congregation to sell the Authority Parcel for expansion of Congregation’s adjacent facility. The Housing Authority continues its efforts to sell the Mamie Thomas Parcel.

Discussion

Based on estimates, the City will receive \$375,000 in CDBG funds for FY 2018-19. The City has also determined that \$33,974 in prior year funds will be available during the fiscal year, and an estimated \$90,000 in program income, generated by the repayment of previously funded housing rehabilitation loans, may also be available to fund additional rehabilitation loans. Other sources and types of funds will be limited due to the current economic climate and the demise of redevelopment tax-increment/housing set-aside funds. The Lake Forest Housing Authority holds assets formally held by the Lake Forest Redevelopment Agency. These assets may be sold in the coming year and proceeds deposited into the Authority's Housing Trust Fund.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	CDBG Program Administration	2015	2019	Administration	Citywide	Program Administration	CDBG: \$70,000	Other: 1 Other
2	Single-family Housing Rehabilitation	2015	2019	Affordable Housing	Citywide	Affordable Housing	CDBG: \$250,000	Homeowner Housing Rehabilitated: 14 Household Housing Unit
3	Public Improvements and Public Facilities	2015	2019	Non-Housing Community Development	Citywide	Non-Housing Community Development	CDBG: \$117,724	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5,890 Persons Assisted (Heroes Park)
4	Youth Services	2015	2019	Non-Homeless Special Needs	Citywide	Non-Housing Community Development	CDBG: \$6,500	Public service activities other than Low/Moderate Income Housing Benefit: 12 Persons Assisted
5	Senior Services	2015	2019	Non-Homeless Special Needs	Citywide	Non-Housing Community Development	CDBG: \$11,050	Public service activities other than Low/Moderate Income Housing Benefit: 41 Persons Assisted
6	Low-Income Persons Services	2015	2019	Non-Homeless Special Needs	Citywide	Non-Housing Community Development	CDBG: \$31,000	Public service activities other than Low/Moderate Income Housing Benefit: 2,922 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Homelessness Prevention	2015	2019	Homeless	Citywide	Homelessness Supportive Services	CDBG: \$2,700	Homelessness Prevention: 17 Persons Assisted
8	Fair Housing	2015	2019	Non-Housing Community Development	Citywide	Program Administration	CDBG: \$5,000	Other: 70 Other
9	Disabled Persons Services	2015	2019	Non-Homeless Special Needs	Citywide	Non-Housing Community Development	CDBG: \$5,000	Public service activities other than Low/Moderate Income Housing Benefit: 38 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	CDBG Program Administration
	Goal Description	CDBG program oversight and coordination
2	Goal Name	Single-family Housing Rehabilitation
	Goal Description	Loans and grants to improve owner occupied housing
3	Goal Name	Public Improvements and Public Facilities
	Goal Description	Public improvements benefitting low and moderate-income persons
4	Goal Name	Youth Services
	Goal Description	Services to assist low- and moderate-income households with children
5	Goal Name	Senior Services
	Goal Description	Services to assist lower income senior households

6	Goal Name	Low-Income Persons Services
	Goal Description	Social services that provide a safety net for lower income persons and homeless
7	Goal Name	Homelessness Prevention
	Goal Description	Limited rental assistance to prevent homelessness
8	Goal Name	Fair Housing
	Goal Description	Fair housing services
9	Goal Name	Disabled Persons Services
	Goal Description	Social services to help assist disabled adults

Table 7 – Goal Descriptions

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):

The City is not a participating jurisdiction in the HUD HOME program; however, an estimated 14 households will be assisted with CDBG-funded rehabilitation during FY 2018-19: two (2) extremely low-income (0% - 30% AMI), five (5) very low-income (30%-50% AMI), and seven (7) low-income households (50%-80% AMI) to be assisted.

AP-35 Projects – 91.220(d)

Introduction

The activities to be undertaken during FY 2018-19 are summarized below. All activities identified are expected to be completed by June 30, 2019. As noted previously, FY 2018-19 CDBG funding allocations for most of the activities listed below will be proportionally increased or decreased from listed estimated funding levels to match the City's actual 2018 allocation once it is announced by HUD.

#	Project Name
1	CDBG Administration
2	Heroes Park Improvements
3	Housing Rehabilitation Loans
4	Paint Program Grants
5	Age Well Senior Services
6	Alzheimer's Orange County
7	Camino Health Center
8	Fair Housing Council of OC
9	Families Forward
10	Family Assistance Ministry
11	Saddleback Valley Unified School District
12	South County Outreach
13	Vocational Visions

Table 8 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The City recognizes that special needs populations (i.e., seniors, disabled and households with extremely low-income) are more likely to become homeless because they are on limited incomes and have other issues that require housing and supportive services; therefore, the City considers supportive services a high priority.

The City anticipates that the greatest obstacle to meeting the underserved needs of the special needs populations will be a lack of financial resources for both supportive services and housing. A common need reported by services providers is affordable housing. Increasing rents, and reductions to the Section 8 Housing Choice Voucher Program and other housing programs, can impact the City's ability to support affordable housing opportunities for extremely low- and very low-income households.

Projects

AP-38 Projects Summary

Project Summary Information

Table 9 – Project Summary

1	Project Name	CDBG Administration
	Target Area	Citywide
	Goals Supported	CDBG Program Administration
	Needs Addressed	Program Administration
	Funding	CDBG: \$70,000
	Description	CDBG program oversight and coordination
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	NA
	Location Description	Citywide
	Planned Activities	CDBG program oversight and coordination including public service grant management, preparation of reports, and IDIS. Funds also allocated for regional plans such as Analysis of Impediments to Fair Housing and 2019 homeless Point-in-Time Survey.
2	Project Name	Heroes Park Improvements
	Target Area	Low/Mod Area
	Goals Supported	Public Improvements and Public Facilities
	Needs Addressed	Non-Housing Community Development

	Funding	CDBG: \$117,724
	Description	Reconstruction and installation of park improvements
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	5,890 individuals
	Location Description	25420 Jeronimo Road, Lake Forest CA - Census Tracts 0320.27 Block Group 1 &2 (50.08% Low/Mod – Lake Forest is an Exception Community with a Low/Mod threshold of 41.58%)
	Planned Activities	Replacement of park lighting, irrigation and drainage, benches, access gates and other park improvements.
3	Project Name	Housing Rehabilitation Loans
	Target Area	Citywide
	Goals Supported	Single-family Housing Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$223,000
	Description	Housing rehabilitation loans for owner-occupied housing units
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	8 low- and moderate-income households
	Location Description	Citywide
	Planned Activities	Loans to rehabilitate owner occupied housing units.

4	Project Name	Paint Program Grants
	Target Area	Citywide
	Goals Supported	Single-family Housing Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$27,000
	Description	Grants to assist homeowners paint the exterior of their home
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	6 low- and moderate-income homeowners
	Location Description	Citywide
	Planned Activities	Grants to assist homeowners paint the exterior of their home.
5	Project Name	Age Well Senior Services
	Target Area	Citywide
	Goals Supported	Senior Services
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$6,050
	Description	In-home support services for home bound seniors
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	16 Seniors and frail elderly

	Location Description	Citywide
	Planned Activities	Case management and in-home support services for home bound seniors and frail elderly.
6	Project Name	Alzheimer's Orange County
	Target Area	Citywide
	Goals Supported	Senior Services
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$5,000
	Description	Adult day services
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	25 seniors and disabled adults
	Location Description	Citywide
	Planned Activities	Adult daycare and ancillary services for seniors and adults with Alzheimer's and other forms of dementia.
7	Project Name	Camino Health Center
	Target Area	Citywide
	Goals Supported	Low-Income Persons Services
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$11,450
	Description	Low-cost medical and pediatric dental services
	Target Date	6/30/2019

	Estimate the number and type of families that will benefit from the proposed activities	1,400 Individuals
	Location Description	30300 Camino Capistrano, San Juan Capistrano CA
	Planned Activities	Reduced cost medical and pediatric dental services for low- and moderate-income persons.
8	Project Name	Fair Housing Council of OC
	Target Area	Citywide
	Goals Supported	Fair Housing
	Needs Addressed	Program Administration
	Funding	CDBG: \$5,000
	Description	Fair housing services
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	70 households (175 Individuals)
	Location Description	Citywide
	Planned Activities	Fair housing outreach, education and enforcement services
9	Project Name	Families Forward
	Target Area	Citywide
	Goals Supported	Low-Income Persons Services
	Needs Addressed	Homelessness Supportive Services
	Funding	CDBG: \$7,500

	Description	Transitional housing, support services and case management for homeless families.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	14 homeless persons with transitional housing
	Location Description	Citywide
	Planned Activities	Case management and transitional housing for homelessness families.
10	Project Name	Family Assistance Ministry
	Target Area	Citywide
	Goals Supported	Homelessness Prevention
	Needs Addressed	Homelessness Supportive Services
	Funding	CDBG: \$6,750 (\$2,700 for prevention and \$4,050 for rapid rehousing)
	Description	Rental assistance to help prevent eviction/homelessness
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	25 lower income individuals at risk of becoming homeless (17 individuals) and that are homeless (8 individuals with rapid rehousing)
	Location Description	Citywide
	Planned Activities	Case management and rental assistance or other forms of assistance to help lower income households from becoming homeless and rapid rehousing assistance for those already homeless.
11	Project Name	Saddleback Valley Unified School District
	Target Area	Citywide
	Goals Supported	Youth Services

	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$6,500
	Description	Childcare services
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	12 low- and moderate-income elementary-age children
	Location Description	Various elementary school locations in Lake Forest
	Planned Activities	Before and after school childcare services. Services also available during summer and holiday school breaks.
12	Project Name	South County Outreach
	Target Area	Citywide
	Goals Supported	Low-Income Persons Services
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$8,000
	Description	Food bank and case management services for lower income individuals, individuals at risk of homelessness, and homeless individuals
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	1,500 low- and moderate-income persons
	Location Description	7 Whatney St. B, Irvine CA

	Planned Activities	Food bank services including case management. Services also include emergency rent and utility assistance to prevent eviction or termination of services. Computer training services are also available.
13	Project Name	Vocational Visions
	Target Area	Citywide
	Goals Supported	Disabled Persons Services
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$5,000
	Description	Job training and development services for adults with disabilities
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	38 adults with developmental disabilities
	Location Description	26041 Pala, Mission Viejo CA
	Planned Activities	Job training and job development services for adults with developmental disabilities.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

HUD permits an exception to the Low- and Moderate-income (LMI) area benefit requirement when an area contain less than 51% LMI residents. This exception applies to entitlement communities that have few, if any, areas within their jurisdiction that have 51% or more LMI residents. This exception is referred to as the “exception criteria” or the “upper quartile.”

Based on HUD data for 2017, the City’s “upper quartile” LMI limit is 48.11%, as few census tracts in the City contain 51% or more LMI. The City of Lake Forest will use this exception criterion in determining where to direct funding in order to address LMI needs in the community. For FY 2018-19, most CDBG funds will be allocated to activities on a citywide basis; however, Heroes Park will serve the needs of residents living within the City’s CDBG Target Area (Census Tract 0320.27, Block Groups 1 and 2).

Geographic Distribution

Target Area	Percentage of Funds
CDBG Target Areas	24
Citywide	76

Table 10 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City does not specifically allocate CDBG funds on a geographic basis; instead, funds are allocated in a manner that best meets the needs of lower income households regardless of where they reside in the City. The City prioritizes the use of its CDBG funding for the preservation of housing that is affordable to lower income households (via rehabilitation) and that helps prevent homelessness or assist those already homeless. These activities are carried out on a citywide basis.

CDBG-funded infrastructure and facility improvements are typically undertaken in LMI areas, which have a higher percentage of lower income residents (see **Attachment 3** – map of the City’s CDBG Target Areas). Some infrastructure/facility improvement projects may be undertaken in areas outside of LMI areas. Such projects are typically limited to those that address ADA regulations.

Discussion

CDBG funds are primarily focused on programs that serve lower income Lake Forest residents regardless of where they live. The City will invest in neighborhoods that are in need of infrastructure improvements or amenities. Such projects will be limited to CDBG eligible areas.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Although the Consolidated Plan and Action Plan focus on affordable housing, the City's only HUD funding source is CDBG, which limits the amount of funding that can be spent on affordable housing due to eligibility limitations prohibiting new construction of housing and funding limitations.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	0
Special-Needs	0
Total	0

Table 11 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	14
Acquisition of Existing Units	0
Total	14

Table 12 - One Year Goals for Affordable Housing by Support Type

Discussion

CDBG public service grant funding will be allocated a local agency that anticipate providing transitional housing to an estimated 14 individuals. The City's CDBG-funded affordable housing strategy is to maintain the affordable housing stock through housing rehabilitation programs and supporting rental assistance programs like the Housing Choice Voucher (the latter is administered by the Orange County Housing Authority) - a total of 210 Lake Forest renter households presently hold a housing assistance voucher or certificate, and 14 homeowners will benefit from CDBG-funded housing rehabilitation.

AP-60 Public Housing – 91.220(h)

Introduction

The City of Lake Forest does not own or manage public housing.

Actions planned during the next year to address the needs to public housing

NA

Actions to encourage public housing residents to become more involved in management and participate in homeownership

NA

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

NA

Discussion

The City supports the efforts of the Orange County Housing Authority, which administers HUD's rental assistance programs for low-income households. The City has no direct involvement in the ownership or management of public housing.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City recognizes the importance of assisting the homeless and near homeless with a continuum of care approach that not only addresses a homeless person's immediate shelter needs, but also provides access to transitional and permanent housing, support services, and employment opportunities to break the cycle of homelessness.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City collaborates and relies on nonprofit partners to reach out to homeless persons (especially unsheltered persons), in assessing individual needs, addressing emergency shelter and transitional housing needs, and to help homeless persons make the transition to permanent housing and independent living. Three agencies identified for CDBG funding in FY 2018-19 provide specific services for the homeless including a housing and needs assessment. Additionally, the Camino Health Center provides outreach and medical services for homeless individuals.

Addressing the emergency shelter and transitional housing needs of homeless persons

In past years, the City utilized CDBG funds to assist nonprofits acquire eight condominium units located within the community for the purpose of providing transitional housing. In 2010, the City's redevelopment agency acquired two additional condominiums that are leased and operate as transitional housing.

For FY 2018-19, the City actively solicited applications from homeless service providers to address homeless needs in the community. The City did not receive funding requests for emergency shelter; however, Families Forward submitted a grant application to support its family transitional housing program. It is anticipated that 14 individuals will be assisted during FY 2018-19.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The Orange County Continuum of Care (CoC) coordinates a system that incorporates several evidence-based practices, including a Housing First approach that involves moving persons directly from the streets into permanent housing accompanied by home-based supportive services. This approach has been effective with chronically homeless persons and families. In past years Lake Forest has utilized

CDBG and local redevelopment funding to expand permanent housing opportunities for the formerly homeless. In earlier program years, CDBG funding was utilized to purchase a condominium for such a purpose. In 2015, the City's Housing Authority (formerly redevelopment agency) sold a four-unit apartment to Families Forward. These units will provide additional permanent housing opportunities for lower income households (including former homeless).

In addition to Rapid Rehousing, the Orange County CoC has focused on addressing the housing needs of several unique homeless households. The Family Redirection Program specifically aims to keep homeless families with children off the streets by prioritizing shelter and housing resources for such households. HUD has also significantly increased the number of rental assistance vouchers specifically for homeless Veterans (i.e., Veterans Affairs Supportive Housing or VASH vouchers). In addition to receiving rental assistance, Veterans with a history of serious mental health illness, substance use disorder or physical disabilities receive case management and appropriate support services from the Department of Veterans Affairs. Currently, 480 VASH vouchers have been put in place by the Orange County Housing Authority (nine in Lake Forest). With respect to unaccompanied youth, there are several residential/supportive services programs available in Orange County designed specifically for youths. Services offered include crisis intervention, drug abuse counseling, and case management.

As previously indicated, the City actively solicited applications from homeless service providers in an effort to address homeless needs in the community. FY 2018-19 CDBG funding allocated to Family Assistance Ministry (FAM) will be used to provide direct financial assistance to households at risk of becoming homeless due to a temporary inability to pay rent. FAM will also utilize CDBG funds to provide rapid rehousing assistance to homeless households. In addition to accessing housing, support services will be provided as a means to assist these program participants transition to permanent housing and independent living.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

For FY 2018-19, the City will allocate CDBG funds to Families Forward, Family Assistance Ministry, and South County Outreach for an array of services to assist the near homeless and those already homeless. Each of these agencies operate food bank programs, which provide an entry point into the respective service agencies. Program applicants undergo an assessment by case managers who determine if additional services are needed and will make applicable referrals. The City will also continue to participate in regional homeless planning efforts including the OC CoC's Discharge Plan, which aims to prevent individuals leaving institutions, hospitals, etc., from becoming homeless.

Discussion

The programs identified above to address the needs of homeless persons and subpopulations of homeless indicate that serving the homeless is a complex issue requiring a network of service providers. The City has allocated CDBG resources to support a network of agencies that will address the needs of the community's homeless and those at risk of becoming homeless and those already homeless.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction

The City's Consolidated Plan provides detailed information regarding barriers to affordable housing and actions to overcome these barriers. The actions to address these barriers during FY 2018-19 are summarized below.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

To address barriers to affordable housing, the City will assist social service agencies that provide fair housing counseling and housing referral services for low- and moderate-income and special needs populations. With respect to the development of new housing, the City's Housing Element has listed the following as action steps that can be taken to remove barriers to affordable housing:

1. Cost of fees and improvements – The entitlement review process contributes to the cost of housing in that holding costs incurred by developers are ultimately included in a unit's selling price or monthly rent. Entitlement review and permit fees are set at rates intended to help the City recoup its costs. The City periodically evaluates the actual cost of processing development permits in an effort to minimize the impact of these fees on housing development.
2. Expedited Project Review – To minimize holding costs, the City prioritizes the review of housing projects with an affordable component, including projects where only a percentage of the total units are affordable. The City utilizes contract staff on an as-needed basis in order to expedite the processing of development applications. Given the importance of a shortened review process for affordable housing development, the City provides priority permit processing for affordable projects.

Discussion

The City's 2015-2019 Consolidated Plan includes an extensive narrative regarding barriers to affordable housing and actions the City can take to mitigate identified barriers. As outlined above, the City undertakes a periodic analysis of development fees and has determined fees are reasonable and appropriate. An expedited development review process is available for affordable housing projects to help reduce holding costs and thus the overall cost of development. The City has little control over market forces such as the cost of land, building materials and labor. There are no growth limit initiatives in Lake Forest. If resources are available, the City may provide some level of gap financing to help reduce overall development costs as an incentive to develop affordable housing.

AP-85 Other Actions – 91.220(k)

Introduction

There are several constraints to meeting the needs of low-income residents; the primary obstacle is a lack of funding to fully address all needs. The economic challenges facing the nation have forced many nonprofits to reduce services at a time when governmental entities are also reducing resources. In response to the level of need, the City has maintained its commitment to utilizing and leveraging resources in an efficient and effective fashion.

Actions planned to address obstacles to meeting underserved needs

The City recognizes that special needs populations face challenges due to low income, the special conditions that they face, and that they are more likely to become homeless as a result of these factors. Special needs populations often require unique housing and supportive services. The City considers supportive services and housing for special needs populations as a high priority. In FY 2018-19 the City will fund public service agencies that assist underserved populations such as the homeless, seniors, the disabled, and low-income families with children.

Actions planned to foster and maintain affordable housing

The City's strategies related to CDBG-funded affordable housing efforts is focused on maintaining the housing stock through the housing rehabilitation program, supporting rental assistance programs like the Housing Choice Voucher, and helping to ensure individuals have access to housing free of discrimination due to race, gender, disability, etc.

Actions planned to reduce lead-based paint hazards

The Residential Lead-Based Paint (LBP) Hazard Reduction Act of 1992 (Title X) changed the federal approach to addressing LBP by increasing the emphasis on prevention of childhood lead poisoning through housing-based approaches. The City has included lead based paint hazard reduction as an eligible activity in the City's Housing Rehabilitation Loan Program.

All application packets for the City's housing rehabilitation program include a notice to educate residents about the health dangers of lead and encourage screening of children for elevated blood-lead levels. Additionally, prior to the use of federal funds, all existing units are screened for lead-based paint as appropriate. Housing units identified as having lead-based paint hazards are treated so the lead-based paint hazards are abated in accordance with current federal requirements. The use of lead-based paint is prohibited in newly constructed units.

Actions planned to reduce the number of poverty-level families

The City will leverage limited CDBG funds to address the needs of poverty-level families by partnering with nonprofit agencies that primarily focus services to these households. Specifically, the City will fund programs that provide safety net services such as food banks, limited rental assistance to prevent

eviction, low cost medical and dental care, reduced cost childcare, and fair housing education/enforcement services.

Actions planned to develop institutional structure

The City of Lake Forest will continue efforts to eliminate institutional gaps and enhance coordination of programs with all segments of the community. For example, the City will partner with nonprofit and special district public entities to deliver public services. City departments will also continue to work together to evaluate programs and projects that may be funded in whole or in part with CDBG funds that address priority needs. The City will assist the Orange County Housing Authority by participating in the Cities Advisory Committee – a quarterly meeting of cities and OCHA to discuss issues related to federal rental housing assistance and housing issues in general. As a member of the Orange County Continuum of Care Community Forum, the City will also continue to provide critical information to the regional Continuum of Care (CoC) as it prepares the County’s annual Continuum of Care Homeless Assistance grant application. The City will also continue to participate in the development of the County’s Ten-Year Plan to end chronic homelessness and the regional discharge plan.

Actions planned to enhance coordination between public and private housing and social service agencies

The City will continue to participate in regional coordination of services by participating in the Cities Advisory Committee - the quarterly meeting of cities and OCHA to discuss issues related to federal rental housing assistance and as a member of the Orange County Continuum of Care Community Forum. On an annual basis, the City meets with service providers that assist City residents to discuss needs and actions that can be taken to better serve residents. Another example of enhanced coordination is the preparation of the 16-city Analysis of Impediments to Fair Housing. The City participated in the preparation of this document which required significant jurisdictional coordination.

Discussion

HUD regulations require that the City prepare an Analysis of Impediments to Fair Housing choice (AI) every five years. In addition to identifying impediments, a strategy to overcome barriers must be developed and implemented annually. Related accomplishments are reported annually. In May 2015, the City of Lake Forest and 15 other Orange County jurisdictions entered into an agreement with GRC Associates to prepare an AI that is compliant with existing AI guidelines. This multi-jurisdictional AI evaluated existing demographic data, past fair housing enforcement activity for each partner community, region and city-specific mortgage lender data, and existing housing and land use public policies. Based on an extensive analysis of this data, and the input of residents, a list of impediments to fair housing choice for the 16-city region was developed. A corresponding set of action steps to ameliorate these barriers was also prepared. Impediments are summarized in **Attachment 4** – a copy of the draft AI is posted on the City’s website. **NOTE: not all of the impediments identified in the AI may be present in Lake Forest.** The specific action steps the City will undertake during FY 2018-19 are also listed in **Attachment 4**.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

Introduction

The program-specific requirements that apply to the City are those for the CDBG program.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
Total Program Income	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low- and moderate-income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

Discussion

The City will meet the 70% low- and moderate-income Overall Benefit requirement for use of CDBG funds in the one-year period of FY 2018-19.

CDBG funds for FY 2018-19 will be allocated to activities that are described above. Community service activities will be qualified either as "low- and moderate-income area benefit" or "limited clientele benefit." Public facility and infrastructure improvements will be qualified under "low- and moderate-income area benefit" or "limited clientele benefit" (e.g., ADA improvements). Housing Rehabilitation

and Neighborhood Pride Paint programs will be available citywide to qualified low- and moderate-income homeowners.

CDBG program income received during FY 2018-19 will be allocated to the City's Housing Rehabilitation Program (Revolving Loan funds). The City does not have surplus funds from urban renewal settlements, nor does the City have grant funds returned to its line of credit. The City will not undertake float-funded activities; therefore, it does not anticipate program income from these types of activities. Finally, the City does not anticipate undertaking urgent need activities during FY 2018-19, nor will it undertake any actions that may result in involuntary displacement of businesses or residents.

As indicated above, if available, CDBG program income will be made available to fund additional housing rehabilitation loans. The City anticipates carrying forward \$0 in housing rehabilitation funds for housing activities during FY 2018-19.

**Five-year Consolidated Plan and One-year
Goals/Accomplishments**

Goal	Category	Expected 5 Yr. Strategic Plan Goals	Actual 5 Yr. Strategic Plan Goals (After 2 Yr.)	% Complete 5 Yr. (After 2 Yr.)	Expected Program Yr. 2 Goals (FY 16-17)	Actual Program Yr. 2 Goals (FY 16-17)	% Complete Program Yr. 2
Decent Housing							
Single-family Housing Rehabilitation	Affordable Housing	55	33	60.0%	11	16	145.5%
Rental Assistance ¹	Public Housing	875	363	41.5%	240	179	74.6%
Suitable Living Environment							
Low-Income Persons Services	Non-Homeless Special Needs	15,000	7,682	51.2%	4,025	3,973	98.7%
Senior Services	Non-Homeless Special Needs	200	38	19.0%	16	18	112.5%
Youth Services	Non-Homeless Special Needs	150	31	20.7%	12	17	141.7%
Public Improvements & Public Facilities ²	Non-Housing Community Development	5,000	2,025	0.0%	500	792	158.4%
Continuum of Care							
Homelessness Prevention	Homeless	25	0	0.0%	0	0	0.0%
Economic Opportunities							
Disabled Persons Services	Non-Homeless Special Needs	100	40	40.0%	42	19	45.2%
Administration							
Fair Housing ³	Non-Housing Community Development	400	155	38.8%	48	65	135.4%
CDBG Program Administration	Administration	5	2	40.0%	1	1	100.0%

1. Activity refers to Rental Assistance Vouchers and Certificates, administered by the Orange County Housing Authority (OCHA).

2. Accomplishments for year 1 and 2 relate to ADA curb ramp projects.

3. Funded as a public service grant in FY 15-16.

**PUBLIC NOTICE
CITY OF LAKE FOREST
2018-2019 Annual Action Plan
Community Development Block Grant Program**

**30 DAY PUBLIC REVIEW AND COMMENT PERIOD
AND NOTICE OF PUBLIC HEARING**

Notice is hereby given that the City of Lake Forest has prepared a draft Community Development Block Grant (CDBG) Annual Action Plan identifying 2018-2019 program allocations. As of the date of publication, the U.S. Department of Housing and Urban Development (HUD) has not announced final CDBG allocations for 2018-2019 (FY 2018-19); however, for planning purposes, the City is estimating its FY 2018-19 CDBG allocation will be \$375,000. Additionally, \$33,974 in carry forward funding, plus \$90,000 in estimated program income will be available during FY 2018-19. A summary of activities proposed for FY 2018-19 CDBG funding is provided below.

Program Name	Program Description	Estimate of Proposed Funding
Public Services	Food distribution, health care services, youth services and senior services	\$56,250
Public Facility Improvements	Park Improvements – Heroes Park	\$117,724
Housing Rehabilitation	Loans and grants to assist homeowners improve residence	\$250,000
CDBG Program Administration	Program coordination, management, staffing, monitoring and reporting; fair housing education and enforcement services	\$75,000

Proposed funding for the activities listed above will be proportionally adjusted once HUD notifies the City of its final CDBG allocation for FY 2018-19.

Copies of the draft FY 2018-19 Annual Action Plan are available for review at the following locations in Lake Forest from 3/30/18 through 4/30/18: 1) Lake Forest City Hall at 25550 Commercentre Drive; 2) El Toro Library at 24672 Raymond Way; 3) Foothill Ranch Library at 27002 Cabriole and on the City-website here: <http://www.lakeforestca.gov/854/Community-Development-Block-Grant> .

Written comments should be submitted no later than noon April 30, 2018 to:

City of Lake Forest
Attn: Ron Santos, Senior Planner
25550 Commercentre Drive, Suite 100
Lake Forest, CA 92630

All written comments received by the City will be responded to in writing.

**A PUBLIC HEARING FOR CITY COUNCIL FINAL ADOPTION OF THE ACTION PLAN IS
SCHEDULED AS FOLLOWS:**

DATE: Tuesday, May 1, 2018

TIME: 6:30 PM, or soon thereafter

LOCATION: Lake Forest City Hall Council Chambers
25550 Commercentre Drive, Suite 100, Lake Forest, CA, 92630

All interested persons are invited to attend the meeting and provide oral and/or written input on this matter. For more information, contact Ron Santos at (949) 461-3449 or rsantos@lakeforestca.gov.

In cities such as Lake Forest where there are few or no areas of low- and moderate-income household concentration, HUD allows areas of low- and moderate-income household concentration to be defined as the upper quartile of concentration. For the City of Lake Forest, areas with at least 48.11% percent low- and moderate-income households are considered areas of low- and moderate-income household concentration.

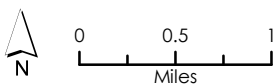
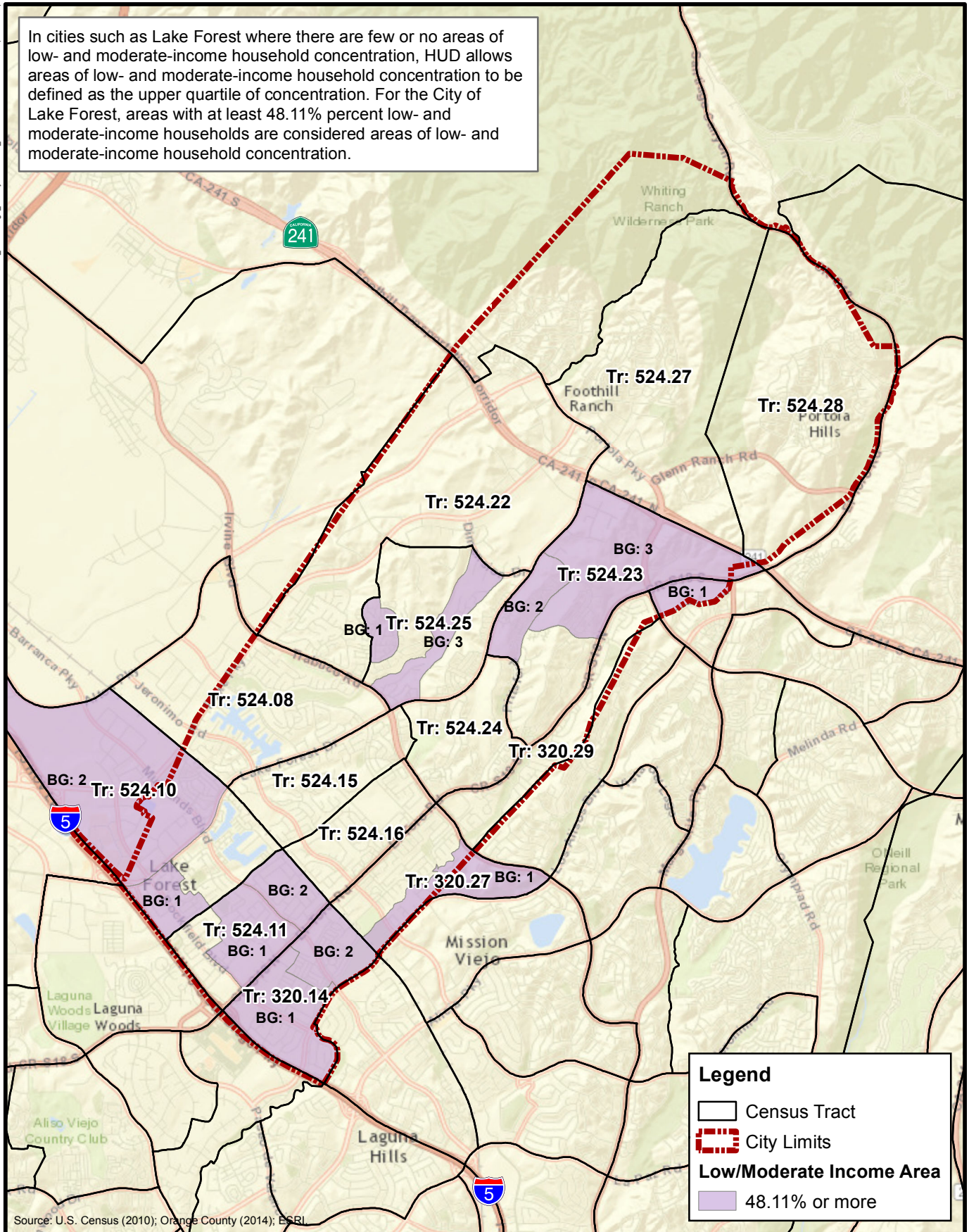


Figure 1
Areas of Low and Moderate Income Concentration

Recommended Actions to Address Impediments

The following actions are recommended to address the impediments to fair housing choice in the 16-city Regional AI:

Regional Impediments Carried Over from 2010 Regional and Sub-regional AI

A-1. Housing Discrimination

Recommendations for All Jurisdictions:

- In partnership with each city's fair housing provider, conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach should include workshops, informational booths, presentations to civic leaders and community groups, staff trainings, and distribution of multi-lingual fair housing literature.
- Conduct focused outreach to small property owners/ landlords; conduct property manager trainings on a regular basis; promote fair housing certificate training.
- Provide general counseling and referrals to address tenant-landlord issues, and provide periodic tenant-landlord walk-in clinics at City Halls and other community locations.
- Include testing/audits within the scope of work for each city's fair housing provider. Support enforcement activity and publicize outcomes of fair housing litigation.

A-2. Racial and Ethnic Segregation

Recommendations for All Jurisdictions:

- Coordinate with fair housing providers to focus fair housing services, education/outreach and/or additional testing in areas of racial/ethnic concentrations.
- Offer a variety of housing opportunities to enhance mobility among residents of all races and ethnicities. Facilitate the provision of affordable housing throughout the community through: 1) available financial assistance; 2) flexible development standards; 3) density bonuses; and 4) other zoning tools.
- Promote equal access to information on the availability of affordable housing by providing information in multiple languages, and through methods that have proven successful in outreaching to the community, particularly those hard-to-reach groups.
- Affirmatively market first-time homebuyer and/or housing rehabilitation programs to low and moderate income areas, and areas of racial/ethnic concentration.
- Work collaboratively with local housing authorities to ensure affirmative fair marketing plans and de-concentration policies are implemented.

A-3. Denial of Reasonable Modifications/ Reasonable Accommodations

Recommendations for All Jurisdictions:

- Through each city's fair housing contractor, continue to provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.
- Provide information on the unlawful practice of denying reasonable modifications/accommodations at fair housing seminars conducted by the Apartment Association of Orange County.

A-4. Discriminatory Advertising

Recommendations for All Jurisdictions:

- Through each city's fair housing contractor, periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements. When identified, make contact with the individual or firm and provide fair housing education.
- Take steps to encourage both the Los Angeles Times and Orange County Register to publish a Fair Housing Notice and a "no pets" disclaimer that indicates rental housing owners must provide reasonable accommodations, including "service animals" and "companion animals" for disabled persons.

A-5. Hate Crimes

Recommendations for All Jurisdictions:

- Continue to monitor FBI data to determine if any hate crimes are housing-related and if there are actions that may be taken by the City or its fair housing service provider to address potential discrimination linked to the bias motivations of hate crimes.
- Continue to coordinate with various City and County housing, building and safety, health and sanitation, law enforcement and legal aid offices to maintain a comprehensive referral list of support services for victims of hate crimes or other violent crimes –inclusive of housing resources.

A-6. Unfair Lending

Recommendations for All Jurisdictions:

- As resources permit, monitor HMDA data annually using the 2013 HMDA analysis as a benchmark.
- As resources permit, monitor the top 10 lenders in Orange County to compare and contrast loan denial rates and percentage of loans completed to minority populations.
- Both of the Orange County fair housing service contractors should assist in identifying potential issues regarding redlining, predatory lending and other illegal lending activities. In addition, each city should review their agreements annually to make sure that increased and comprehensive services

are being provided, and that education and outreach efforts are expanded and affirmatively marketed in low and moderate income and racial concentrated areas.

- Each city should explore ways to collaborate with local lenders and support lenders' efforts to work with community groups to help minority households purchase their homes. Collaborative efforts should ensure that minority groups have access and knowledge of City programs, supportive services, and provide for networking opportunities with these groups.
- Coordinate with local lenders to expand outreach efforts to first time homebuyers in minority neighborhoods.
- Affirmatively market first-time homebuyer and/or housing rehabilitation programs in neighborhoods with high denial rates, high minority population concentrations and limited English speaking proficiency to help increase loan approval rates.

Public Sector Impediments

B-1. Housing Element Compliance

Recommendations for Specific Jurisdictions:

- The Cities of Fullerton and San Clemente should pursue State certification of their Housing Elements.

B-2. Housing for Persons with Disabilities

Recommendations for Specific Jurisdictions:

- The City of San Clemente should adopt formal Reasonable Accommodations policy and procedure in 2016.
- The Cities of Anaheim, Tustin and La Habra should consider eliminating the processing fee for reasonable accommodation requests.
- The City of Newport Beach should consider amending its Reasonable Accommodation procedures to eliminate the requirement for a public hearing, and to approve administratively.

B-3. Zoning Regulations

Recommendations for Specific Jurisdictions:

- The City of Newport Beach should consider pursuing a Zoning Code amendment to eliminate the current age restriction on second units and establish a ministerial review process.
- The Cities of Buena Park, Orange and Santa Ana should amend their Zoning Codes to specify provisions for SRO units.
- The Cities of Fountain Valley and Orange should amend their Zoning Codes to regulate transitional and supportive housing as a residential use, subject to the same standards as other residential uses of the same type in the same zone.

B-4. Density Bonus Incentives

Recommendations for All Jurisdictions:

- All 16 jurisdictions should amend their Zoning Codes to reflect current State density bonus law.

Table 8-1: City of Lake Forest Fair Housing Action Plan 2015/16 - 2019/20

Impediment	Actions	Time Frame
A. Regional, Private Sector Impediments Carried Over from 2010 Regional and Subregional AI		
A-1. Housing Discrimination	<p>Data indicates housing discrimination continues to exist throughout Orange County, as evidenced by the number of complaints and fair housing cases opened by the Fair Housing Foundation and Fair Housing Council of Orange County. An average of 85 cases were opened in the participating cities over the past three years, with the leading bias based on disability (physical and mental), followed by familial status, national origin and race.</p> <ul style="list-style-type: none"> a) Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach should include workshops, informational booths, presentations to civic leaders and community groups, staff trainings, and distribution of multi-lingual fair housing literature. b) Conduct focused outreach to small property owners/landlords; conduct property manager trainings on a regular basis; promote fair housing certificate training. c) Provide general counseling and referrals to address tenant-landlord issues, and provide periodic tenant-landlord walk-in clinics at City Halls and other community locations. d) Include testing/audits within the scope of work for each city's fair housing provider. Support enforcement activity and publicize outcomes of fair housing litigation. 	<p>Ongoing 2015/16 - 2019/20</p>
A-2. Racial and Ethnic Segregation	<p>Residential segregation refers to the degree in which groups live separately from one another. As presented within the Community Profile, there are areas of racial/ethnic concentrations in the County. Approximately ten percent of households are considered to be limited English-speaking households.</p> <ul style="list-style-type: none"> a) Coordinate with fair housing providers to focus fair housing services, education/outreach, and/or additional testing in areas of racial/ethnic concentrations. b) Offer a variety of housing opportunities to enhance mobility among residents of all races and ethnicities. Facilitate affordable housing throughout the community through: 1) available financial assistance; 2) flexible development standards; 3) density bonuses; and 4) other zoning tools. c) Promote equal access to information on the availability of affordable housing by providing information in multiple languages, and through methods that have 	<p>Ongoing 2015/16 - 2019/20</p>

Table 8-1: City of Lake Forest Fair Housing Action Plan 2015/16 - 2019/20

Impediment		Actions	Time Frame
		<p>proven successful in outreaching to the community, particularly those hard-to-reach groups.</p> <p>d) Affirmatively market first-time homebuyer and/or housing rehabilitation programs to low and moderate income areas, and areas of racial/ethnic concentration.</p> <p>e) Work collaboratively with local housing authorities to ensure affirmative fair marketing plans and de-concentration policies are implemented.</p>	
A-3. Denial of Reasonable Modifications/ Reasonable Accommodations	Denial of reasonable modification or reasonable accommodation is a continuing impediment to fair housing choice, and represents over one-half of alleged discriminatory acts in the 16 participating jurisdictions.	<p>a) Through each city's fair housing contractor, continue to provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/ accommodations is unlawful.</p> <p>b) Provide information on the unlawful practice of denying reasonable modifications/accommodations at fair housing seminars conducted by the Apartment Association of Orange County.</p>	Ongoing 2015/16 - 2019/20
A-4. Discriminatory Advertising	Regionally, there were incidents of discriminatory advertising that have the potential to discourage a certain type of renter or buyer from pursuing a housing opportunity. Ads indicating a preference for a certain type of tenant or buyer, such as "no pets", "no children", or "Ideal for single adult" have the effect of housing discrimination.	<p>a) Through each city's fair housing contractor, periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements. When identified, make contact with the individual or firm and provide fair housing education.</p> <p>b) Take steps to encourage both the Los Angeles Times and Orange County Register to publish a Fair Housing Notice and a "no pets" disclaimer that indicates rental housing owners must provide reasonable accommodations, including "service animals" and "companion animals" for disabled persons.</p>	Ongoing 2015/16 - 2019/20

Table 8-1: City of Lake Forest Fair Housing Action Plan 2015/16 - 2019/20

	Impediment	Actions	Time Frame
A-5. Hate Crimes	Hate crimes committed at a residence are an impediment to fair housing choice because they impact the lives of an average of 35 households per year in the 16 participating Orange County cities. Of the total 169 hate crime incidents reported between 2010 and 2014, 57 incidents were related to race, 38 to religion, 37 to sexual orientation, 33 to ethnicity, 2 to disability and 2 to gender identity.	<ul style="list-style-type: none"> a) Continue to monitor FBI data to determine if any hate crimes are housing related and if there are actions that may be taken by the City or its fair housing service provider to address potential discrimination linked to the bias motivations of hate crimes. b) Continue to coordinate with various City and County housing, building and safety, health and sanitation, law enforcement and legal aid offices to maintain a comprehensive referral list of support services for victims of hate crimes or other violent crimes –inclusive of housing resources. 	Ongoing 2015/16 - 2019/20
A-6. Unfair Lending	Disparities in the home purchase loan denial rates experienced by Hispanic and Black/African American applicants within the 16 Orange County cities creates an impediment to fair housing choice as they have loans denied at rates 1.5 to 1.6 times greater than White applicants. In addition, Hispanic residents, which comprise 34 percent of Orange County's population, account for just 10 percent of home purchase loans, and the percentage of completed mortgage loans by Hispanics has decreased in each of the past five years.	<ul style="list-style-type: none"> a) As resources permit, monitor HMDA data annually using the 2013 HMDA analysis as a benchmark. b) As resources permit, monitor the top 10 lenders in Orange County to compare and contrast loan denial rates and percentage of loans completed to minority populations. c) Both of the Orange County fair housing service contractors should assist in identifying potential issues regarding redlining, predatory lending and other illegal lending activities. Each city should review their agreements annually to make sure that increased and comprehensive services are being provided, and that education and outreach efforts are expanded and affirmatively marketed in low and moderate income and racial concentrated areas. d) Each city should explore ways to collaborate with local lenders and support lenders' efforts to work with community groups to help minority households purchase their homes. Collaborative efforts should ensure that minority groups have access and knowledge 	Annually 2017 Ongoing 2015/16 - 2019/20 2017

Table 8-1: City of Lake Forest Fair Housing Action Plan 2015/16 - 2019/20

Impediment		Actions	Time Frame
		of City programs, supportive services, and provide for networking opportunities with these groups.	2017
		e) Coordinate with local lenders to expand outreach efforts to first time homebuyers in minority neighborhoods.	2016
		f) Affirmatively market first-time homebuyer and/or housing rehabilitation programs in neighborhoods with high denial rates, high minority population concentrations and limited English speaking proficiency to help increase loan approval rates.	
B. Public Sector Impediments <i>(Only actions pertinent to Lake Forest identified)</i>			
B-4. Density Bonus Incentives	All 16 jurisdictions have adopted local density bonus ordinances which implement state density bonus law, providing density and other development incentives and concessions for the provision of affordable housing. However, with the recent addition of anti-displacement provisions under AB 222, and modified parking standards for transit-accessible projects under AB 744, all 16 jurisdictions should update their density bonus ordinances to reflect these new State requirements.	a) All 16 jurisdictions should amend their Zoning Codes to reflect current State density bonus law.	2016